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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

OWOLABI SALIS

Plaintiff,

- against -

AMERICAN EXPORT LINES AND  
ATLANTIC CONTAINER LINE

Defendants.

**PETITION FOR REMOVAL PURSUANT TO  
28 U.S.C. §§ 1446 and 1337**

Defendant American Export Lines (hereinafter "AEL") hereby petitions this Court pursuant to 28 U.S.C. §§ 1446 and 1337 to remove to this Court the above-captioned civil action now pending in the Civil court of the State of New York, County of New York, and further represent as follows:

1. Defendant/Petitioner AEL is a defendant in the civil action now pending in the Civil Court of the State of New York, County of New York Index number 25436/2007. No trial has yet been had therein. Copies of pleadings served upon or by defendant/petitioner in this action are attached hereto.

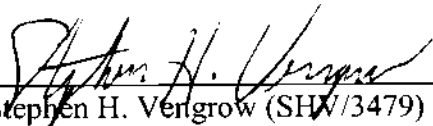
2. Civil Court of the State of New York Index number 25436/2007 is one which may be removed pursuant to 28 U.S.C. §1337 in that the matter concerns a civil action or proceeding

arising under an Act of Congress regulating commerce, including, the Harter Act, 46 USC App §§ 190-195; Carriage of Goods by Sea Act 46 USC App §§1302-1313 (2006) and the liability of carriers under receipts and bills of lading at 49 U.S.C. §14706.

**WHEREFORE**, this action now pending in the Civil Court of New York, County of New York, index number 25436/2007, is properly removed pursuant to 28 U.S.C. §§ 1446 and 1337.

Dated: July 2, 2007

CICHANOWICZ, CALLAN, KEANE,  
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Attorneys for Defendant American Export Lines

By:   
Stephen H. Vengrow (SHV/3479)  
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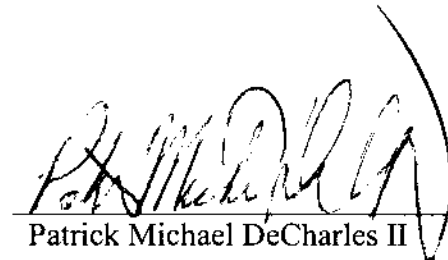
CERTIFICATE OF SERVICE BY REGULAR U.S. MAIL

The undersigned declares under penalty of perjury that the following is true and correct:

1. I am over the age of eighteen years and I am not a party to this action.
2. On July 2, 2007, I served a complete copy of **Defendant American Export Lines' Petition For Removal Pursuant to 28 U.S.C. §§ 1446 and 1337** by regular U.S. mail to the following attorneys at the following addresses:

TO: Salis & Associates, P.C.  
42 Broadway, Room 1133  
New York, New York 10007-2801  
(212) 655-5749

Mahoney & Keane  
111 Broadway, Floor 10  
New York, New York 10006  
(212) 385-1422



Patrick Michael DeCharles II

DATED: July 2, 2007  
New York, New York